

## Shorter, Chere

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**From:** chafic.maalouf@verizon.net%inter2 [chafic.maalouf@verizon.net] on behalf of chafic.maalouf@verizon.net  
**Sent:** Saturday, December 18, 2004 1:20 AM  
**To:** Shorter, Chere  
**Subject:** Olive Oil Standards

Dear Ms. Shorter,

This is in regard to a proposal submitted by the COOC ( California Olive Oil Council) to the USDA, to change the olive oil standards set in March of 1948. I realize that the deadline for submitting comments on this matter is Dec 8, 2004. I've just found out about this and I hope that you'll take my comments into consideration.

My Family has been making high quality, virgin olive oils since 1959 and we take a lot of pride in what we do as an olive oil company. I agree with the COOC that the standards should be updated. I also agree with all of the proposed standards except for one:

Extra Virgin Olive Oil should have a free fatty acid content of less than 1.4% (as the current standard for US grade A) and not 0.8 % as proposed by the COOC. a 0.8% free fatty acid content is a very harsh measure that's going to put a lot of excellent olive oil makers out of business for the following reasons:

1- Virgin olive oils produced from old cultivars, that have not been excessively bred, are naturally high in oleic acid content. Those cultivars produce excellent olive oils possessing great organoleptic properties. Lowering the standard to 0.8 % is going to force a lot of growers to uproot historic trees that are of great cultural and economic value and replace them by inferior cultivars.

2- Olive oils extracted by traditional stone presses have a higher oleic acid content than those extracted using high speed, stainless steel mills. Only 3 weeks ago I harvested one of my groves and I split the yield into 2 batches so as to run a little experiment. Each batch was about 3 Metric tons. One batch was pressed using a traditional stone press and the other using a high speed mill ( Ammenduni ). Bear in mind that those 2 batches were identical, harvested from the same trees and the same field. The batch extracted the traditional way gave an oleic acid content of 0.9 % whereas the batch extracted using the high tech mill gave an oleic acid content of 0.6 %. Both batches yielded olive oils with excellent color, flavor and odor. A measure like that will be forcing many olive oil makers to get rid of there old traditional presses and replace them with high tech mills, if they can afford it. That will also have a huge cultural and economic impact.

3- There's a direct relationship between the free fatty acid content in the olive oil and the count of disease-damaged fruits. In our operation, we've always lived with a tolerable disease level in our groves and very rarely had to use chemical sprays to control diseases. When you lower the number to 0.8, you'd be forcing growers to adopt a zero tolerance policy in the operation which will require the heavy usage of chemicals. From both, a health and an environmental perspective that would be the wrong thing to do.

4- Such a measure is going to make extra virgin olive oil an exclusive product to fewer growers. That, along with the high price of the Euro is going to drive the price high and deprive millions of Americans from enjoying the beautiful product for price reasons and force them to buy cheaper and less healthy oils.

For the above reasons, I think that a free fatty acid content of 0.8% is a very harsh measure that will punish many olive oil makers by forcing them to either take a lower profit or shut down completely. I'm asking you very kindly and with urgency not to go along with the proposed 0.8% for extra Virgin. The fact that Europe has adopted such a number doesn't mean that we have to go along. We, In the United states have our own values and standards in so many respects and we don't necessarily follow. A virgin olive oil with an oleic acid content of 1.4% is still an excellent olive oil. Also, a virgin olive oil with an oleic acid content of 0.6 is not necessarily better than a virgin olive oil with an oleic acid content of 0.9. There are many other factors to be considered including economical, cultural, environmental and human factors.

Thank you for your consideration,

12/20/2004

Best Regards,

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P.S Would you please let me know if you're going to admit my comments, thank you.